

EVERETT B. GIBSON LAW FIRM

950 MORGAN KEEGAN TOWER
50 N. FRONT STREET

MEMPHIS, TENNESSEE 38103

TELEPHONE: (901) 576-8211
TELECOPIER: (901) 576-8149

ASSOCIATES
RALPH T. GIBSON
DANTON ASHER BERUBE

August 17, 1995

Peter Raack, Esq.
Assistant Regional Counsel
United States Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: Carrier Air Conditioning Site, Collierville, TN

Dear Mr. Raack:

This letter serves as Norfolk Southern Railway Company's response to the lengthy letter from Mr. Russell V. Randle, attorney for Carrier Corporation, to you dated July 13, 1995, and his recent colossal package to you dated July 26, 1995, concerning Norfolk Southern's right of way adjacent to the above-referenced site. Please make this letter and its attachments a part of the administrative record regarding the site.

Mr. Randle's July 13, 1995 letter, transmitted by his office that evening, was premature for two reasons. First, representatives of Norfolk Southern, EPA, and Carrier were previously scheduled to meet, and did in fact meet, at the site the next morning. After the meeting all parties appeared satisfied that Hill Brothers' proposed activities would not present a threat to remediation at the adjacent site as long as a few minor safeguards are followed.

Second, the plans by Hill Brothers and Norfolk Southern are now on hold until the dispute between Carrier and Norfolk Southern over the extent of Norfolk Southern's right of way reaches final disposition in Norfolk Southern's favor. Hill Brothers takes this position because it risks being ejected from the property in midstream after it has spent the time and money to level the small 12' by 40' area within the right of way to make a driveway for trucks to park during the loading process and after it has changed its operations from transporting the crushed limestone by truck, which it is currently doing, to transporting it by rail. Carrier's local counsel was advised of this development by letter dated July 18, 1995. As you may recall, I also advised you of this development in our recent phone conversation.

For this same reason, the issues raised in Mr. Randle's latest letter of July 26, 1995, are currently moot. Notwithstanding this, however, Norfolk Southern will respond to the July 26, 1995 letter to correct the various misstatements of fact and embellishments contained in it. Norfolk Southern assumes that the July 26, 1995 letter supersedes the July 13, 1995 letter as



EVERETT B. GIBSON LAW FIRM

Peter Raack, Esq.

August 17, 1995

Page 2

to Carrier's position in this matter and will, therefore, respond only to the July 26, 1995 letter.

Initially, we do not understand how Mr. Randle can, in good conscience, assert that Norfolk Southern is "seeking access to perform work at this Superfund site without regard for the restrictions and requirements of the ongoing remedial work performed by Carrier under the UAO, but which may interfere materially with that effort" (July 26, 1995 letter, pp. 1-2) when Norfolk Southern has acted in the utmost good faith and cooperation in its efforts to convince Carrier and EPA that Hill Brothers' proposed operations on the spur track will pose no threat to the remediation at the adjacent property. *Inter alia*, Norfolk Southern has talked freely with EPA and Carrier regarding every aspect of the proposed operation, including a meeting at the site with Carrier's representatives and the EPA's Remedial Project Manager, conducted soil sampling at the railroad's expense, including providing split samples to Carrier, and responded fully and in a satisfactory manner to each of Carrier's expanding concerns.

Mr. Randle's most recent letter to you also suffers from some inherent contradictions. For example, on page 3 of his July 26, 1995 letter, he states: "It is unfortunate that the railroad filed its lawsuit before seeking [a] conference with EPA and Carrier about this site," yet, on page 10 of his July 26, 1995 letter, Mr. Randle concedes that "[i]n late May, discussions began with the railroad" and Carrier, which was well before the lawsuit was filed. Moreover, Mr. Randle implies throughout his letter that Carrier has been conciliatory throughout the negotiations; however, in other parts of his letter, Mr. Randle makes such statements as: "Please note that Carrier vigorously contests the allegations in that amended complaint, and believes that some of the factual assertions contained in it are false."¹ The fact is that Carrier has vigorously contested and continues to vigorously contest Norfolk Southern's position on every issue, whether the issue involves state property law or whether it involves remotely potential environmental concerns. That is why Norfolk Southern was compelled to file the lawsuit to enjoin Carrier from interfering with the railroad's right to exercise its easement right within its

¹ Carrier asserts that Norfolk Southern falsely alleges in its Amended Complaint that Carrier demanded licensing fees from Norfolk Southern and Hill Brothers. Norfolk Southern made this allegation in its original complaint, but upon further investigation determined that it should delete the allegation in its Amended Complaint. All references to licensing fee demands were therefore deleted from the factual assertions contained in Norfolk Southern's Amended Complaint. Completely due to a clerical mistake, however, a single reference to licensing fees was not deleted in Count One of the Amended Complaint. Carrier's local counsel was promptly notified of this clerical mistake and that the mistake would be corrected in subsequent pleadings and at trial. Mr. Randle is charged with notice of Norfolk Southern's representations to his client's local attorneys.

Peter Raack, Esq.

August 17, 1995

Page 3

right of way.

Mr. Randle continues to assert that the filing of the state court lawsuit is somehow an event of *force majeure* rendering it impossible for Carrier to continue with its remediation efforts on the adjacent property. This is utter nonsense. Norfolk Southern's state court lawsuit against Carrier involves only two issues of state property and contract law: (1) whether Norfolk Southern's right of way extends 50 feet or 100 feet on either side of the center of the main line track and (2) whether, in any event, Norfolk Southern has the right to use or allow third parties to use the spur track under its siding agreement with Carrier. The Court is not being asked to interpret the provisions of the UAO or anything else to do with the remediation on the adjacent property.

In reality, Carrier is putting up a smoke screen by involving EPA in the property dispute between it and Norfolk Southern in an attempt to confuse the issues before the Court. Although Carrier's initial concerns about Hill Brothers' proposed operations may have been legitimate, Carrier's continued efforts to find expanded concerns can only be viewed as an attempt to aid its defense in the property dispute. Carrier's assertions to the contrary, Norfolk Southern attempted to settle the property issues with Carrier well before the filing of the lawsuit and attempted in the utmost good faith to satisfy Carrier that Hill Brothers' proposed operations will not interfere in any manner with the remediation at the adjacent site. Instead, it has been Carrier and not Norfolk Southern that has raised ever increasing issues, all of which have reached the ludicrous point. Carrier's assertions that Norfolk Southern has acted in bad faith in filing the lawsuit and in purportedly failing to acknowledge the UAO completely misrepresent the record.

Carrier attempts to put up additional smoke screens by raising irrelevant issues concerning Hill Brothers' activities at other sites. First, Carrier needlessly lengthens its latest letter by discussing Hill Brothers' clearing of some Carrier property Hill Brothers mistakenly believed to be owned by an adjacent landowner. Norfolk Southern is without sufficient knowledge to respond to Carrier's irrelevant allegations concerning this matter; however, from what little it knows, the fault was not Hill Brothers' but the adjacent landowner's who insisted throughout the ordeal that he owned the disputed property. In any event, as Carrier's own exhibit 4 to its July 26 letter reflects, Hill Brothers immediately acknowledged the mistake and restored the property as requested by Carrier. The irrelevance of the foregoing is further magnified in the current matter because the very essence of the dispute between Norfolk Southern and Carrier involves property boundaries and the extent of the railroad's easement rights thereto. Hill Brothers will not prepare the site or undertake the unloading operations of the crushed limestone rock until the dispute is finally disposed of in Norfolk Southern's favor.

Additionally, Carrier calls into question Hill Brothers' ability to transload crushed

Peter Raack, Esq.

August 17, 1995

Page 4

limestone rock by assailing Hill Brothers' compliance with air pollution and stormwater discharge permits at another site. Specifically, Carrier claims that through its covert surveillance of Hill Brothers' cement plant, it has discovered piles of sand, standing water from truck washing operations, and an uncapped PVC pipe. Besides the fact that these do not appear to be significant concerns, such concerns are irrelevant to Hill Brothers' ability to successfully and safely transload crushed limestone rock. Moreover, and dispositive of these concerns, we have been informed that Hill Brothers will not have to comply with a stormwater discharge permit or an air pollution permit for the operation in question because the Tennessee Department of Energy and Conservation's Water Pollution Control Division ("TDEC") and the Memphis and Shelby County Health Department's Air Pollution Control Division have determined that the proposed operation is exempted from stormwater discharge and air pollution permitting requirements. See letter dated July 24, 1995, from Lew E. Hoffman, Environmental Specialist at TDEC, attached hereto as Exhibit A, and letter dated August 8, 1995, from J. Carter S. Gray, Manager at the Memphis and Shelby County Health Department's Air/Pollution Control Division, attached hereto as Exhibit B.

In response to Carrier's request that EPA issue an administrative order to Norfolk Southern and Hill Brothers concerning the proposed operation, Norfolk Southern believes that such an order is unnecessary not only because it currently would be moot but also because the proposed operation, if it ever takes place, will not pose a threat to remediation at the adjacent site. Specifically, Carrier requests that nine issues be addressed in such an order.

1. There will be no interference with or endangerment of the monitoring wells or any other remediation equipment at the adjacent site nor will there be any interference with any ongoing remediation work being done at the adjacent site. At the July 14, 1995 meeting, Norfolk Southern's environmental engineer, Joe Oliver, suggested that the monitoring wells should be painted a bright color so that trucks would be less likely to run over the wells.² Mr. Oliver was referring to trucks driven by the City of Collierville and Norfolk Southern's track repair crew, which track repair crew stays in mobile homes a few hundred feet west of the spur track. As I stated at the time and during the conference call with you, Mr. Oliver was not referring to any trucks that will be involved in Hill Brothers' proposed operation. Of course, Mr. Randle materially omits this fact from his letter, leaving the reader with the impression that Hill Brothers' trucks will be driven in close proximity to the wells. This is not the case. As the map attached hereto as Exhibit C reflects, the trucks will leave the gravel road just east of the spur track, well

² In addition, painting the monitoring wells a bright color helps protect the railroad track repair crew living in the mobile homes near the wells from suffering injuries if they fail to see the wells at night and trip over them.

EVERETT B. GIBSON LAW FIRM

Peter Raack, Esq.
August 17, 1995
Page 5

east of the closest well, and back up to the loading point between the main line track and the spur track. The trucks will then reenter the road at the same point. This point is marked with an "X" on Exhibit C. No trucks in connection with Hill Brothers' transloading operation will get near the wells or other remediation equipment via this route.

2. Hill Brothers will conduct the transloading operation as represented to you in my July 11, 1995 letter to you. Additionally, the requirements as set out in the letter from the Air/Pollution Control Section, attached as Exhibit B, will be followed. Hill Brothers will not deviate from the site construction and operations plan without first notifying Norfolk Southern, Carrier and EPA. Of course, the operation has been planned very carefully so that the operation will not interfere with the remediation at the adjacent site, and it is therefore unlikely that any changes in the plan will be necessary.

3. As stated earlier, a stormwater permit is not required for this operation. Notably, it is TDEC (and not EPA or Carrier) which has jurisdiction over the issuance of stormwater permits. TDEC has been authorized by EPA to implement the stormwater permit program for the state.

4. As stated earlier, an air pollution permit is not required for this operation. In addition, it is the Memphis and Shelby County Health Department's Air Pollution Control Division (and not EPA or Carrier) which has jurisdiction over the issuance of any such permit.

5. The Chancery Court has ordered that Norfolk Southern must purchase a \$1 million dollar bond and Hill Brothers must show proof of its environmental impairment liability insurance policy covering the operation before it will issue a temporary restraining order. Hill Brothers currently has a commercial general liability policy in effect at the site. Norfolk Southern will not participate in the proposed unloading at the site and therefore does not need such a policy. Norfolk Southern is a self-insured Fortune 500 company. As information, Norfolk Southern employees are not covered by workers' compensation, although Hill Brothers' employees are. Norfolk Southern employees are subject to the Federal Employers' Liability Act.

6. See response to number 5. Both Norfolk Southern and Hill Brothers would be liable to EPA and Carrier for any liability caused by their negligence, however, as provided by common law.

7. Because no air pollution or stormwater permit is required for this operation, there is no obligation to preserve any records regarding permits.

8. Norfolk Southern took soil samples near the spur track only to convince Carrier

EVERETT B. GIBSON LAW FIRM

Peter Raack, Esq.

August 17, 1995

Page 6

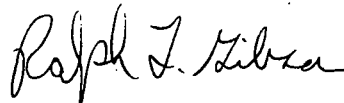
that there was no contaminated soil at the point where the unloading will take place. As Carrier concedes there is no volatile organic compound contamination and only background levels of metals in the soil. A copy of the test results is attached as Exhibit D. Norfolk Southern does not intend to take further soil samples.

9. Because the proposed transloading operation will affect only a small area of surface soil near the spur track, Norfolk Southern has no interest in taking and does not intend to take groundwater samples.

In conclusion, Norfolk Southern believes that it has addressed Carrier's concerns and that the proposed transloading operation, which will require neither a stormwater nor an air permit, will not impact or interfere with the remediation Carrier is conducting. No *force majeure* has occurred or will occur as the proposed transloading activity will not hinder Carrier's remedial activities or endanger the well equipment. Inasmuch as the test results from these two wells are favorable (according to Carrier), perhaps the EPA should consider Carrier's request that the wells be removed from the project.

Had Norfolk Southern been able to work out Carrier's concerns before suit was filed, it would have. But Carrier's intransigence on certain points left Norfolk Southern with no option but to press its ownership of a charter right of way easement interest over the disputed property in court - a question the EPA cannot resolve. We regret that the EPA has become embroiled in this dispute, and, while it would be inappropriate to add Norfolk Southern as a party to the Unilateral Administrative Order to the site (since Norfolk Southern is not a potentially responsible party), Norfolk Southern and Hill Brothers continue to be willing to cooperate with the EPA about any concerns EPA may have. We are very interested in the EPA's preliminary assessment of this matter so that future lengthy correspondence from Mr. Randle can be avoided. Too many resources have already been expended in what should have been a straight forward matter. It is time that Carrier went back to concerning itself with the remediation of the contamination caused by Carrier's operations. I look forward to hearing from you.

Sincerely yours,



Ralph T. Gibson

RTG:rb

Attachments

EVERETT B. GIBSON LAW FIRM

Peter Raack, Esq.
August 17, 1995
Page 7

cc: Ms. Elizabeth Brown
Rosco A. Field, Esq.
Russell V. Randle, Esq.



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
MEMPHIS ENVIRONMENTAL FIELD OFFICE
SUITE E-645, PERIMETER PARK
2510 MT. MORIAH
MEMPHIS, TENNESSEE 38115-1520

July 24, 1995

Joseph E. Oliver
Engineer, Environmental Operations
Norfolk Southern Railway Company
7208 Old Rutledge Pike
Knoxville, TN 37914

Dear Mr. Oliver:

As I had mentioned during our phone conversation of July 21, 1995, a storm water Notice Of Intent (NOI) for construction activity is required only for development / construction activities of which five (5) acres or more are cleared or disturbed. In addition, the facility's Standard Industrial Classification code (SIC) as described during our phone conversation and in your letter dated July 21, 1995 is 4789. This category does not, at this time, require the submittal of a NOI for industrial activity whereas railroad facilities which are involved in equipment maintenance, washing, etc. are covered under their own NOI, i.e. the main yard.

I am including a copy of the Rules for Construction Activity, 1200-04-10-.05 for your reference.

If you have any questions on this matter, please feel free to call me at (901) 368-7960.

Sincerely:

Lew E. Hoffman
Environmental Specialist
TDEC Water Pollution Control

c John Leonard

cc WJ HARRIS
RW AMBLER
RT GEORGE

Exhibit A



MEMPHIS AND SHELBY COUNTY
HEALTH DEPARTMENT

YVONNE S. MADLOCK
Director

JOHN B. KIRKLEY, M.D.
Interim Health Officer



DR. W. W. HERENTON
Mayor of Memphis

JIM ROUNT
Mayor of Shelby County

August 8, 1995

Mr. Ralph T. Gibson
Everett B. Gibson Law Firm
950 Morgan Keegan Tower
50 N. Front Street
Memphis, TN 38103

Dear Mr. Gibson:

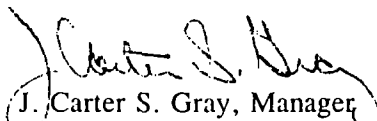
This Department has reviewed your request for guidance regarding the transloading of crushed limestone from railcars directly into trucks as described in your letter dated August 4, 1995.

We have determined that an air emissions construction and/or operating permit is not required for this operation provided the following conditions are met:

- A. The transloading shall occur on the spur track located adjacent to the Carrier Corporation property in Collierville, Tennessee.
- B. The crushed limestone shall be transloaded in a wet condition to minimize airborne emissions.
- C. The transloading operation be limited to the 100,000 tons of limestone over a period not to exceed two years.
- D. There shall be no stockpiling of materials at the transloading site.
- E. The transloading area must be maintained to minimize nuisance emissions.
- F. Records must be maintained to demonstrate compliance with the above listed conditions.

If circumstances change which would affect the transloading operation, this Department should be provided the opportunity to review the changes to determine current applicable requirements. If you have any questions please call me or Alan M. Hekking at (901) 576-7653.

Sincerely,



J. Carter S. Gray, Manager

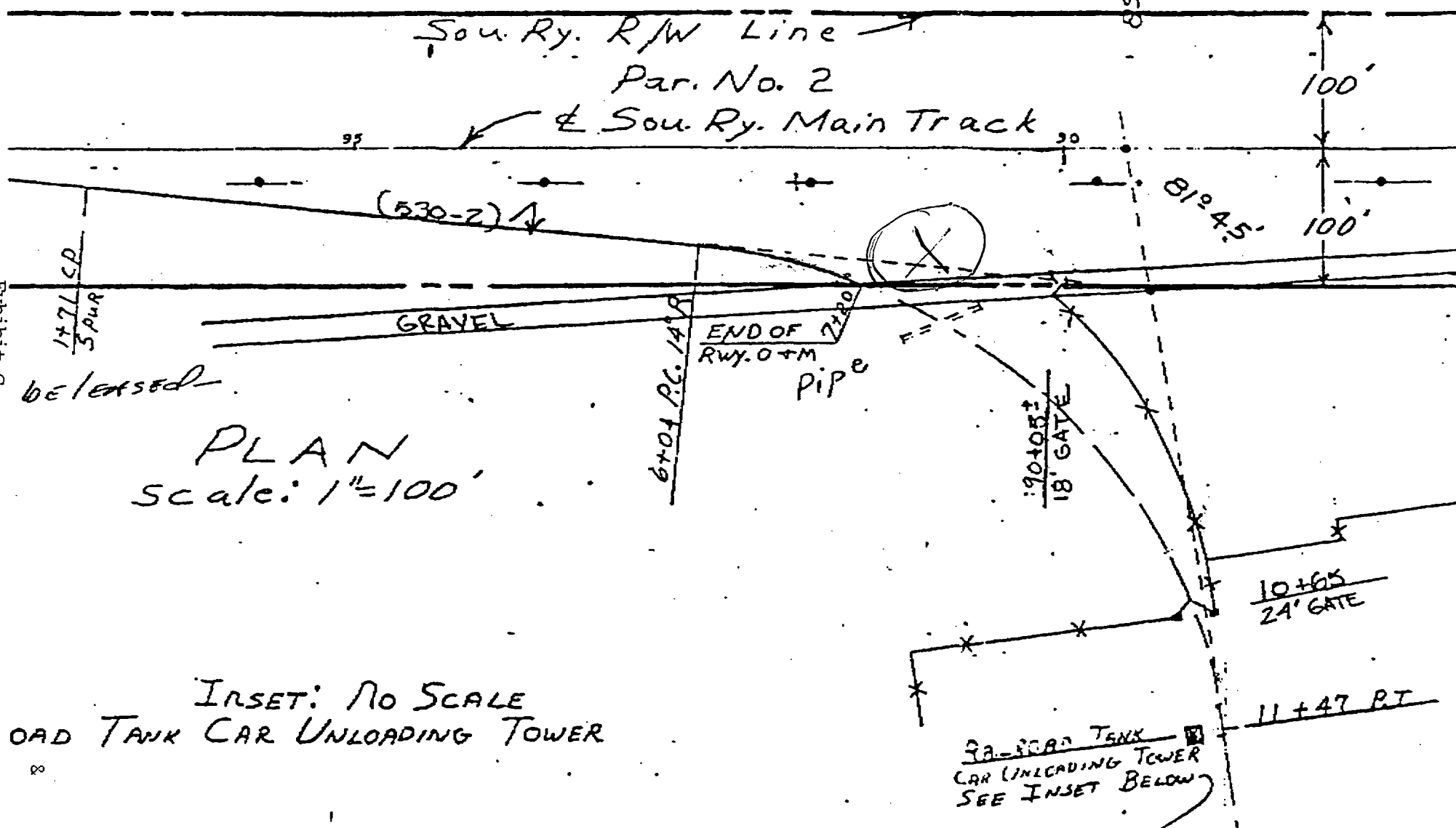
AIR/POLLUTION CONTROL SECTION

JCSG:AMH:kj

pc: Source Files - #0690
Branch Correspondence Files

INSET: NO SCALE
CAR UNLOADING TOWER

Exhibit C



CHAIN OF CUSTODY RECORD

CLIENT NORFOLK SOUTHERN CORP.						P.O.# ODP								TURN AROUND TIME (Check One) <input type="checkbox"/> Standard <input checked="" type="checkbox"/> RUSH <input checked="" type="checkbox"/> PRIORITY ONE													
ADDRESS 7208 OUB RYLEDGE RD.						PHONE # 615/521-1594																					
KNOXVILLE, TN 37914						FAX# 615/521-1593																					
ATTENTION J.E. OLIVER																											
PROJ. NO.		PROJECT NAME CARRIER SPUR SITE - (MEMPHIS)										VOLATILES										REMARKS					
		COLLECTED BY JARRIN RIMMONEN - E&E J.E. OLIVER - AS, E.F. TAYLOR - M & H/D BORE LOGS																									
STA. NO.	DATE	TIME	CONF.	GRAB	STATION LOCATION	NO. OF CONTAINERS																					
A1				X	SURFACE	1											HOLD										
A2				X	3'	1	X											DA06483									
B1				X	SURFACE	1											HOLD										
B2				X	3'	1											HOLD										
C1				X	SURFACE	1											HOLD										
C2				X	3'	1											HOLD										
D1				X	SURFACE	1											HOLD										
D2				X	3'	1	X											DA06484									
E1				X	SURFACE	1											HOLD										
E2				X	3'	1											HOLD										
Relinquished by: (Signature)			Date/Time			Received by: (Signature)			Relinquished by: (Signature)			Date/Time			Received by: (Signature)												
<i>[Signature]</i>			7/14/95 8:52 AM			<i>[Signature]</i>																					
Relinquished by: (Signature)			Date/Time			Received for Laboratory by: (Signature)			Date/Time			Remarks															
						<i>[Signature]</i>			7-14-95 0945			Run A2, D2, F-1, F-2 Hold other samples. See Voc Officer. see Run															

Exhibit D



ENVIRONMENTAL SERVICE LABORATORIES, INC.

Norfolk Southern Railway Co.
7208 Old Rutledge Pike
Knoxville, TN 37914
Attn: Joe Oliver

Lab Number DA06483
Date Received 07/15/95
Sample Date
Sample Time
Sample Matrix SOIL
Sample Description A2-3', Carrier Spur Site

TEST METHODS:

- *1-Standard Methods for the Examination of Water and Wastewater, 18th Edition, 1992.
- *2-Methods for Chemical Analysis of Water and Wastes, EPA March, 1983.
- *3-EPA Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater, EPA-600/4-82-057, July, 1982.
- *4 Methods for Evaluating Solid Waste Physical/Chemical Methods SW-846, Third Edition, November, 1986.

PARAMETER	DATA	UNITS	METHOD	ANALYST	DATE	TIME
Dichlorodifluoromethane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Chloromethane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Vinyl Chloride	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Chloroethane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Trichlorofluoromethane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,1-Dichloroethene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Methylene Chloride	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
trans-1,2-Dichloroethene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,1-Dichloroethane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
2,2-Dichloropropane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
cis-1,2-Dichloroethene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Chloroform	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Bromochloromethane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,1,1-Trichloroethane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,1-Dichloropropene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Carbon tetrachloride	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Benzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,2-Dichloroethane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Trichloroethene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,2-Dichloropropane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Bromodichloromethane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Dibromomethane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
2-Chloroethylvinylether	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
cis-1,3-Dichloropropene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50

P.O. Box 19964
Birmingham, Alabama 35219
PHONE: 942-5995

P.O. Box 2866
Decatur, Alabama 35602
PHONE: 350-3385



ENVIRONMENTAL SERVICE LABORATORIES, INC.

Norfolk Southern Railway Co.

Lab Number

DA06483

PARAMETER	DATA	UNITS	METHOD	ANALYST	DATE	TIME
Toluene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
trans-1,3-Dichloropropene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,1,2-Trichloroethane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Tetrachloroethene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,3-Dichloropropane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Dibromochloromethane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,2-Dibromoethane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Chlorobenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,1,1,2-Tetrachloroethane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Ethylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Xylenes, Total	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Styrene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Bromoform	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Isopropylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,1,2,2-Tetrachloroethane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,2,3-Trichloropropane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Bromobenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
n-Propylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
2-Chlorotoluene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,3,5-Trimethylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
4-Chlorotoluene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
tert-Butylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,2,4-Trimethylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
sec-Butylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,3-Dichlorobenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
p-Isopropyltoluene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,4-Dichlorobenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
n-Butylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,2-Dichlorobenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,2-Dibromo-3-Chloropropane	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,2,4-Trichlorobenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Hexachlorobutadiene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
Naphthalene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50
1,2,3-Trichlorobenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	13:50

P.O. Box 19964
Birmingham, Alabama 35219
PHONE: 942-5995

P.O. Box 2866
Decatur, Alabama 35602
PHONE: 350-3385



ENVIRONMENTAL SERVICE LABORATORIES, INC.

Norfolk Southern Railway Co.
7208 Old Rutledge Pike
Knoxville, TN 37914
Attn: Joe Oliver

Lab Number DA06484
Date Received 07/15/95
Sample Date
Sample Time
Sample Matrix SOIL
Sample Description D2-3', Carrier Spur Site

TEST METHODS:

- *1-Standard Methods for the Examination of Water and Wastewater, 18th Edition, 1992.
- *2-Methods for Chemical Analysis of Water and Wastes, EPA March, 1983.
- *3-EPA Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater, EPA-600/4-82-057, July, 1982.
- *4-Methods for Evaluating Solid Waste Physical/Chemical Methods SW-846, Third Edition, November, 1986.

PARAMETER	DATA	UNITS	METHOD	ANALYST	DATE	TIME
Dichlorodifluoromethane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Chloromethane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Vinyl Chloride	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Chloroethane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Trichlorofluoromethane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,1-Dichloroethene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Methylene Chloride	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
trans-1,2-Dichloroethene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,1-Dichloroethane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
2,2-Dichloropropane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
cis-1,2-Dichloroethene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Chloroform	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Bromochloromethane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,1,1-Trichloroethane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,1-Dichloropropene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Carbon tetrachloride	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Benzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,2-Dichloroethane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Trichloroethene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,2-Dichloropropane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Bromodichloromethane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Dibromomethane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
2-Chloroethylvinylether	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
cis-1,3-Dichloropropene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43

P.O. Box 19964
Birmingham, Alabama 35219
PHONE: 942-5995

P.O. Box 2866
Decatur, Alabama 35602
PHONE: 350-3385





ENVIRONMENTAL SERVICE LABORATORIES, INC.

Norfolk Southern Railway Co.

Lab Number

DA06484

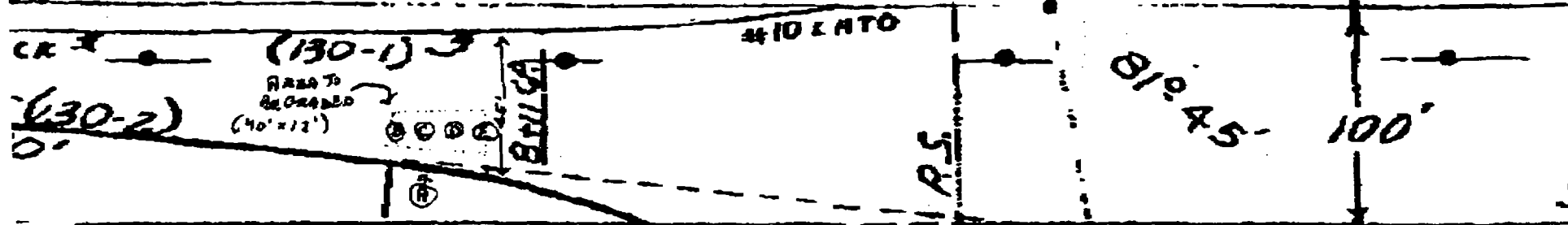
PARAMETER	DATA	UNITS	METHOD	ANALYST	DATE	TIME
Toluene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
trans-1,3-Dichloropropene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,1,2-Trichloroethane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Tetrachloroethene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,3-Dichloropropane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Dibromochloromethane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,2-Dibromoethane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Chlorobenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,1,1,2-Tetrachloroethane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Ethylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Xylenes, Total	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Styrene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Bromoform	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Isopropylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,1,2,2-Tetrachloroethane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,2,3-Trichloropropane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Bromobenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
n-Propylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
2-Chlorotoluene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,3,5-Trimethylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
4-Chlorotoluene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
tert-Butylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,2,4-Trimethylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
sec-Butylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,3-Dichlorobenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
p-Isopropyltoluene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,4-Dichlorobenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
n-Butylbenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,2-Dichlorobenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,2-Dibromo-3-Chloropropane	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,2,4-Trichlorobenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Hexachlorobutadiene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
Naphthalene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43
1,2,3-Trichlorobenzene	<5.0	ug/Kg	8260*4	KH	07/17/95	14:43

P.O. Box 19964
Birmingham, Alabama 35219
PHONE: 942-5995

P.O. Box 2866
Decatur, Alabama 35602
PHONE: 350-3365



✓ E Sou Ry. Main Track



N

6+04 P.C. 14° R

END OF Rwy. O + M PIPE

10+11 P.S.
130-1

SAMPLE

- A - CENTER OF SIDING TRACK
- B - W END OF PROPOSED GRADING AREA
16' 6" N OF CENTER OF SIDING TRACK
- C - 15' FROM WEST END OF PROPOSED GRADING AREA
16' N OF CENTER OF SIDING TRACK
- D - 27' FROM WEST END OF PROPOSED GRADING AREA
16' N OF CENTER OF SIDING TRACK
- E - 40' FROM WEST END OF PROPOSED GRADING AREA
14' 4" N OF CENTER OF SIDING TRACK
- F - COMPOSITE OF A-E SEE INSET BELOW

- 1 SAMPLES AT SURFACE
- 2 SAMPLES AT 3' DEPTH

9LE
TOWER

11+47 P.T.

4-529-2004
07/21/1995 13:00

6155211593

JUL 01 20

NORFOLK SOUTHERN EP

PAGE 07